

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SANTIAGO PINEDA, all others
similarly situated under
29 U.S.C. 216 (b), and MARIA PENA
Plaintiffs,

v.

JTCH APARTMENTS, LLC
and SIMONA VIZIREANU,
Defendants.

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Cause No. 3:13-cv-00588-B

PLAINTIFFS' ADDENDUM TO PLAINTIFFS' MOTION FOR ATTORNEYS' FEES
PURSUANT TO 29 U.S.C. § 216(b)

COME NOW, Plaintiffs Santiago Pineda ("Pineda") and Maria Pena ("Pena")
(collectively, "Plaintiffs"), through undersigned counsel, and file this Addendum to Plaintiffs'
Motion for Attorneys' Fees Pursuant to 29 U.S.C. § 216(b), and would respectfully show as
follows:

INTRODUCTION

1. Currently before the Court are Plaintiffs' Motion for Attorney Fees Pursuant to 29 U.S.C.
§ 216(b) (**DE 96**) (hereinafter the "Fee Motion"), Plaintiffs' Motion for Imposition of
Liquidated Damages and Entry of Judgment (**DE 97**) (hereinafter the "Liquidated
Damages Motion"), Defendants' Response and Objection to Plaintiffs' Motion for
Attorneys' Fees and Liquidated Damages (**DE 100**) (hereinafter the "Response"), and
Plaintiffs' Reply Regarding Plaintiffs' Motion for Attorneys' Fees and Motion for
Liquidated Damages (**DE 101**) (hereinafter, the "Reply").
2. Plaintiffs have incurred additional fees since filing Plaintiffs' Fee Motion totaling
\$3,801.00. The additional fees were incurred drafting and filing Plaintiffs' Reply (**DE**

101) and Plaintiffs' Response to Defendants' Rule 59 Motion to Alter or Amend Judgment and to Reurge Defendants' Rule 50 Motion for Judgment as a Matter of Law and Brief in Support. (**DE 99**). Those fees are based on 15.9 hours of work done by the following attorneys as set out in the accompanying ledger attached as Exhibit A:

Attorney	Initials On Billing Records	Hourly Rates	Total Hours Worked On The Case	Total Fees
Robert Manteuffel, Esq.	RM	\$350.00/hr.	1.2	\$420
Joshua Petersen, Esq.	JAP	\$230.00/hr.	14.7	\$3,381

3. In the interest of judicial economy, rather than file another supplemental fee motion which would result in the filing of an additional response and reply and creating a loop of motions, responses, and replies that could continue *ad infinitum*, Plaintiffs are filing this Addendum and ask the Court to take notice of the additional hours worked and fees incurred by Plaintiffs' counsel during the briefing of that followed the filing of Plaintiffs' Fee Motion.

PRAYER

WHEREFORE, the Plaintiffs respectfully request that the Court take account of these hours when preparing the final order on the Plaintiffs' Fee Motion.

Respectfully submitted,


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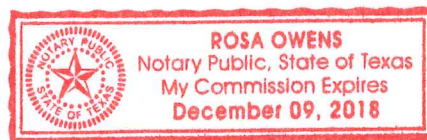
ATTORNEYS FOR PLAINTIFF

VERIFICATION

On April 24, 2015 appeared Robert L. Manteuffel who is personally known to me and affirmed that the contents and attachments to this addendum are correct.


Robert L. Manteuffel


NOTARY PUBLIC/STAMP



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on all counsel and parties of record by electronic service in accordance with the local rules of United States District Court for the Northern District of Texas, Dallas Division this 24th day of April, 2015.

/s/ Joshua A. Petersen

Joshua A. Petersen

COUNSEL FOR THE PLAINTIFF(S)